



Your business
is our business.

REDACTED FOR PUBLIC INSPECTION

7852 Walker Drive, Suite 200
Greenbelt, Maryland 20770
phone: 301-459-7590, fax: 301-577-5575
internet: www.jsitel.com, e-mail: jsi@jsitel.com

July 3, 2017

Via Hand Delivery

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

**Re: WC Docket No. 14-58
2017 ETC Annual Report of Vermont Telephone Company, Inc.
Study Area Code 147332**

Dear Ms. Dortch:

On behalf of Vermont Telephone Company, Inc. ("Company"), JSI files the attached confidential version of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission's rules.¹ Company seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.² The redacted version is being filed this date via the FCC's Electronic Comment Filing System.

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

¹ 47 C.F.R. §§ 54.313, 54.422.

² *Connect America Fund et al.*, WC Docket Nos. 10-90 and 14-58, Protective Order, DA 16-296 rel. March 22, 2016 (Protective Order). 47 C.F.R. § 54.313(f)(2).

**FCC Form 481 - Carrier Annual Reporting
Data Collection Form**FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	147332
<015>	Study Area Name	VERMONT TEL. CO-VT
<020>	Program Year	2018
<030>	Contact Name: Person USAC should contact with questions about this data	Gordon Mathews
<035>	Contact Telephone Number: Number of the person identified in data line <030>	8028857712 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	gmathews@vermontel.com
Form Type		54.313 and 54.422

<010>	Study Area Code	147332
<015>	Study Area Name	VERMONT TEL. CO-VT
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Gordon Mathews
<035>	Contact Telephone Number - Number of person identified in data line <030>	8028857712 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	gmathews@vermontel.com

No

(300) Unfulfilled Service Request Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<039>	Contact Email Address - Email Address of person identified in data line <030>	gmathews@vermontel.com

<300> Unfulfilled service request (voice)

0

<310> Detail on attempts (voice)

Name of Attached Document

<320> Unfulfilled service request (broadband)

0

<330> Detail on attempts (broadband)

Name of Attached Document

<010>	Study Area Code	147332
<015>	Study Area Name	VERMONT TEL. CO-VT
<020>	Program Year	2018
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<035>	Contact Telephone Number - Number of person identified in data line <030>	8028857712 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	gmathews@vermontel.com
<400>	Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed voice	
<410>	Complaints per 1000 customers for fixed voice	0 . 5
<420>	Complaints per 1000 customers for mobile voice	
<430>	Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed broadband	
<440>	Complaints per 1000 customers for fixed broadband	0 . 0
<450>	Complaints per 1000 customers for mobile broadband	

(500) Compliance With Service Quality Standards and Consumer Protection Rules Data Collection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	147332
<015>	Study Area Name	VERMONT TEL. CO-VT
<020>	Program Year	2018
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<035>	Contact Telephone Number - Number of person identified in data line <030>	8028857712 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	gmathews@vermontel.com
<500>	Certify compliance with applicable service quality standards and consumer protection rules	Yes
147332VT510 .pdf		
<510>	Descriptive document for Service Quality Standards & Consumer Protection Rules Compliance	
<515>	Certify compliance with applicable minimum service standards	

(600) Functionality in Emergency Situations Data Collection Form	REDACTED FOR PUBLIC INSPECTION	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	147332
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<020>	Program Year	2018
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<035>	Contact Telephone Number - Number of person identified in data line <030>	8028857712 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	gmathews@vermontel.com
<600>	Certify compliance regarding ability to function in emergency situations	Yes
<610>	Descriptive document for Functionality in Emergency Situations	147332VT610.pdf

<010>	Study Area Code	147332
<015>	Study Area Name	VERMONT TEL. CO-VT
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Gordon Mathews
<035>	Contact Telephone Number - Number of person identified in data line <030>	8028857712 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	gmathews@vermontel.com
<701>	Residential Local Service Charge Effective Date	1/1/2017
<702>	Single State-wide Residential Local Service Charge	

-- See attached worksheet

<010>	Study Area Code	147332
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-- See attached worksheet --

**(800) Operating Companies
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	gmathews@vermontel.com
<810>	Reporting Carrier	Vermont Telephone Company, Inc.
<811>	Holding Company	Vermont National Telephone Company, Inc.
<812>	Operating Company	Vermont Telephone Company, Inc.

[illegible]

**(900) Tribal Lands Reporting
Data Collection Form**

 FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

<010>	Study Area Code	147332
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<039>	Contact Email Address - Email Address of person identified in data line <030>	gmathews@vermontel.com

<900> Does the filing entity offer tribal land services? (Y/N) No

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached PDF, on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable

**(1000) Voice and Broadband Service Rate Comparability
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	gmathews@vermontel.com

<1000> Voice services rate comparability certification Yes

<1010> Attach detailed description for voice services rate comparability compliance

Name of Attached Document

<1020> Broadband comparability certification

Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau

<1030> Attach detailed description for broadband comparability compliance

Name of Attached Document

**(1100) No Terrestrial Backhaul Reporting
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	gmathews@vermontel.com

<1100> Certify whether terrestrial backhaul options exist (Y/N)

Yes

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

(1200) Terms and Condition for Lifeline Customers
Lifeline
Data Collection Form

FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	gmathews@vermontel.com

147332VT1210.pdf

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP www.vermontel.com

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- | | |
|--|-------------------------------------|
| <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, | <input checked="" type="checkbox"/> |
| <1222> Details on the number of minutes provided as part of the plan, | <input checked="" type="checkbox"/> |
| <1223> Additional charges for toll calls, and rates for each such plan. | <input checked="" type="checkbox"/> |

(2005) Price Cap Carrier Additional Documentation

FCC Form 481

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

July 2013

<010>	Study Area Code	147332
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<039>	Contact Email Address - Email Address of person identified in data line <030>	gmathews@vermontel.com

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

- <2011> 3rd Year Certification 47 CFR §54.313(b)(1)(ii) - Note that for the July 2017 certification, this applies to Round 2 recipients of Incremental Support.
- <2022> Recipient certifies, representing year three after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbps/1Mbps - 54.313(b)(2)(i). Round 2 recipients only.
- <2023> The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers year three - 54.313(b)(2)(ii). Round 2 recipients only.
- <2024A> Round 2 Recipient of Incremental Support?
- <2024B> Attach list of census blocks indicating where funding was spent in year three - 54.313(b)(2)(ii). Round 2 recipients only.
- <2025A> Round 2 Recipient of Incremental Support?
- <2025B> Attach geocoded Information for Phase I milestone reports (Round 2 for year three) - Connect America Fund , WC Docket 10-90, Report and Order, FCC 13-73, paragraph 35 (May 22, 2013).
- <2015> 2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)

Name of Attached Document Listing
Required Information

Name of Attached Document Listing
Required Information

(2005) Price Cap Carrier Additional Documentation

Data Collection Form

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

<2016> Certification support used to build broadband

Connect America Phase II Reporting {47 CFR § 54.313(e)}

<2017A> Connect America Fund Phase II recipient?

<2017C> Total amount of Phase II support, if any, the price cap carrier used for capital expenditures in 2016.

<2018> Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(1)(ii)(A)

Name of Attached Document Listing
Required Information

<2019> Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(1)(ii)(C)

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<039>	Contact Email Address - Email Address of person identified in data line <030>	gmathews@vermontel.com

Select from the drop down menu or check the boxes below to note compliance with 54.313(f)(1). Privately held carriers must ensure compliance with the financial reporting requirements set forth in 47 CFR 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3009)	Progress Report on 5 Year Plan Carrier certifies to 54.313(f)(1)(iii)		
		Yes - Attach Certification	
(3010A)	Certification of Public Interest Obligations {47 CFR § 54.313(f)(1)(i)}		
(3010B)	Please Provide Attachment	Name of Attached Document Listing Required Information	147332VT3010.pdf
(3012A)	Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)}	No - No New Community Anchors	
(3012B)	Please Provide Attachment	Name of Attached Document Listing Required Information	
(3013)	Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)}	(Yes/No)	<input checked="" type="radio"/> <input type="radio"/>
(3014)	If yes, does your company file the RUS annual report	(Yes/No)	<input checked="" type="radio"/> <input type="radio"/>
Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:			
(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)	<input checked="" type="checkbox"/>	
(3016)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows	<input checked="" type="checkbox"/>	
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	Name of Attached Document Listing Required Information	147332VT3017.pdf
(3018)	If the response is no on line 3014, is your company audited?	(Yes/No)	<input type="radio"/> <input type="radio"/>
If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:			
(3019)	Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers	<input type="checkbox"/>	
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<input type="checkbox"/>	
(3021)	Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit.	<input type="checkbox"/>	
If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:			
(3022)	Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers	<input type="checkbox"/>	
(3023)	Underlying information subjected to a review by an independent certified public accountant	<input type="checkbox"/>	
(3024)	Underlying information subjected to an officer certification.	<input type="checkbox"/>	
(3025)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows	<input type="checkbox"/>	
(3026)	Attach the worksheet listing required information	Name of Attached Document Listing Required Information	

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(3005) Rate Of Return Carrier Additional Documentation (Continued)

FCC Form 481

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	gmathews@vermontel.com

Financial Data Summary

(3027) Revenue

(3028) Operating Expenses

(3029) Net Income

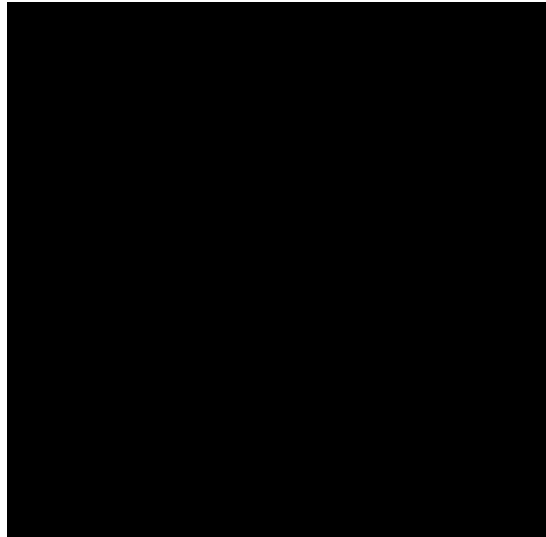
(3030) Telephone Plant In Service(TPIS)

(3031) Total Assets

(3032) Total Debt

(3033) Total Equity

(3034) Dividends



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4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission’s public interest obligations. All RBE participants must provide a response to Line 4001.

4001. Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

Community Anchor Institutions – FCC 14-98 (paragraph 79)

4003a. RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

If yes to 4003A, please provide a response for 4003B.

4003b. Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year.	Name of Attached Document Listing Required Information	_____
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Broadband Deployment Locations – FCC 14-98 (paragraph 80)

4004a. Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481.	Name of Attached Document Listing Required Information	_____
--	--	-------

4004b. Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband speed and data usage allowances available in the relevant geographic area.	Name of Attached Document Listing Required Information	_____
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**Certification - Reporting Carrier
Data Collection Form**

 FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	gmathews@vermontel.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Certification - Agent / Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	147332
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<039> Contact Email Address - Email Address of person identified in data line <030>	gmathews@vermontel.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) <u>JSI</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	<u>JSI</u>
Name of Reporting Carrier:	<u>VERMONT TEL. CO-VT</u>
Signature of Authorized Officer:	<u>CERTIFIED ONLINE</u> Date: <u>06/30/2017</u>
Printed name of Authorized Officer:	<u>Frances Stocker</u>
Title or position of Authorized Officer:	<u>Chief Financial Officer</u>
Telephone number of Authorized Officer:	<u>8028857745 ext.</u>
Study Area Code of Reporting Carrier:	<u>147332</u> Filing Due Date for this form: <u>07/03/2017</u>
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	<u>VERMONT TEL. CO-VT</u>
Name of Authorized Agent Firm:	<u>JSI</u>
Signature of Authorized Agent or Employee of Agent:	<u>CERTIFIED ONLINE</u> Date: <u>06/30/2017</u>
Name of Authorized Agent Employee:	<u>Olivia D. Hill</u>
Title or position of Authorized Agent or Employee of Agent	<u>Regulatory Consultant</u>
Telephone number of Authorized Agent or Employee of Agent:	<u>3014597590 ext.</u>
Study Area Code of Reporting Carrier:	<u>147332</u> Filing Due Date for this form: <u>07/03/2017</u>
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

Vermont Telephone Company, Inc.’s demonstration of complying with applicable service quality standards and consumer protection rules for voice and broadband services:

In establishing this certification in its *2005 ETC Order*,¹ the FCC found that an ETC must make “a specific commitment to objective measures to protect consumers.”² The Commission found that for wireless ETCs, compliance with CTIA’s Consumer Code for Wireless Service would satisfy this requirement” and that the sufficiency of other commitments would be considered on a case-by-case basis.³ In this context, the FCC stated, “to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement.”⁴

Vermont Telephone Company, Inc. (“Vermont Telephone”) hereby certifies that it is complying with applicable service quality standards and consumer protection rules. Vermont Telephone Company, Inc. is subject to consumer protection obligations under state law. These obligations include, but are not limited to, the following: (1) filing a Local Exchange Tariff pursuant to the requirements of the Vermont Public Service Board (PSB) Rules 7.500 and 7.600, which discloses rates, terms and conditions of service to customers; (2) adherence to state consumer protection requirements governing telephone

¹ *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) (“*2005 ETC Order*”).

² *Id.* at para. 28.

³ *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: “(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy.” *Id.* at n. 71.

⁴ *Id.* at n. 72.

providers as identified in Docket 5903, Attachment 2, Consumer Protection Standards, protection against cramming and other deceptive practices as identified in PSB Rule 4.700; (3) truth-in-billing requirements as identified in PSB Rule 4.700; and (4) CPNI, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

In addition, Vermont Telephone Company, Inc. certifies compliance with broadband specific consumer protection obligations under federal law. The federal law obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in F.C.C. 47 C.F.R. Part 8 §8.3. The Company furthermore will comply with all requirements set forth in the *2015 Open Internet Order* when it becomes effective.

Vermont Telephone Company, Inc.’s Ability to Function in Emergency Situations for voice and broadband.

Vermont Telephone Company, Inc. (“Company”) hereby certifies that it is able to function in emergency situations as set forth in the Code of Federal Regulations, Title 47, Part 54, Subpart C, §54.202(a)(2).¹ The Company’s network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations will also allow the Company to manage traffic spikes throughout its network, as emergency situations require.

Specifically, each central office building is supplied with standby generators and battery back-up that enable the central office to keep running until power is restored so long as fuel is available, or until system changes are made to reroute traffic.

The Company’s standby generators and battery back-up support both voice and broadband network equipment should an emergency situation occur.

Company complies with the FCC's backup power requirements, effective October 16, 2015.

¹ Section 54.202(a)(2) requires ETCs that are designated by the Commission to “demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.”

(700) Price Offerings including Voice Rate Data Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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July 2013

<701>	Residential Local Service Charge Effective Date	1/1/2017
<702>	Single State-wide Residential Local Service Charge	

[illegible]

REDACTED FOR PUBLIC INSPECTION

(710) Broadband Price Offerings
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	147332
<015>	Study Area Name	VERMONT TEL. CO-VT
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Gordon Mathews
<035>	Contact Telephone Number - Number of person identified in data line <030>	8028857712 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	gmathews@vermontel.com

[illegible]

(800) Operating Companies	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

Vermont P.S.B. No. 1
Vermont Telephone Co., Inc.

VERMONT PUBLIC
SERVICE BOARD

7th
Section 4
Revised Sheet 24
Cancels 5th Revised Sheet 24
6th

4.14 VTel Plain Talk Service 2002 JUN 14 A 11:16

4.14.1 GENERAL

- (1) VTel Plain Talk Service is an optional local calling plan offered, subject to availability of facilities, as a supplement to one-party residence and business telephone exchange service.
- (2) This service provides for twenty hours of local calling from the customer's originating exchange to exchanges within the customer's local calling area as specified in Section 4.7. Message time in excess of the twenty hour allowance is charged for at the per minute rates shown in Section 4.13.3. Customers subscribing to Digital Subscriber Line (DSL) service will receive 8000 minutes of local calling when subscribed to Plain Talk Service. (T)
- (3) VTel Plain Talk Service rates apply only to customer-dialed station-to-station sent-paid calls when facilities are available for customer dial completion. The rates also apply to operator-completed station-station sent-paid calls for handicapped persons unable to dial calls because of their handicap. All other calls are charged for at the rates specified in Section 7.1.2. (T)
- (4) Accumulation of message time is done on a whole minute basis. Individual messages with fractional totals are rounded to the next higher minute.
- (5) There are no time of day restrictions with VTel Plain Talk Service.
- (6) VTel Plain Talk Service is not available for person-person, collect, charge to a calling card number, third party telephone number, conference or other calls which normally require an operator.
- (7) Subscribers to VTel Plain Talk Service may also subscribe to the Plain Talk Feature Package and are eligible for Plain Talk Additional Line discounts. Business and Residential packages and rates are set forth in Section 4.14.2 following. The calling allowance is applied in aggregate across all lines in the account subscribed to the Plain Talk Feature package
- (8) Plain Talk subscribers who also have DSL service are eligible for the Additional Line discount with or without subscription to the VahuPak feature package

4.14.2 RATES AND CHARGES

- (1) VTel Plain Talk Service is provided at the following rates, which are inclusive of rates and charges for associated one-party main telephone exchange service. This rate does not include associated services, as appropriate.
- (2) The one time charge as specified in Section 6.1.2.B applies when VTel Plain Talk Service is ordered subsequent to the installation of a network access line.

Issued: June 10, 2002
Effective: July 1, 2002

Michel Guité
President

Vermont P.S.B. No. 1
Vermont Telephone Co., Inc.

Section 4
2nd Revised Sheet 24.1
Cancels 1st Revised Sheet 24.1

4.14.2 RATES AND CHARGES (cont.)

(3)

Local Dial Tone Plus	Residential	\$20.15 Monthly*	(I)
20 Hour Local Calling Allowance	Business	\$30.00 Monthly*	
Local Dial Tone Plus DSL	Residential	\$20.15 Monthly*	(I)
8000 Minute Local Calling Allowance	Business	\$30.00 Monthly*	

* Applicable whether or not calls are made. Each additional minute or fraction thereof charged at rates specified in Section 4.13.3.

(4) ValuPak Feature Bundle – the following feature packages are available in conjunction with VTel Plain Talk Service for both primary and discounted Plain Talk Additional Lines.

ValuPak@Home	Call Waiting Conference Calling Return Call (*69) Repeat Dial TeenLine Call Trace Caller ID Name Caller ID Number Home Intercom Service No Receiver Off Hook Residential Call Hold	Call Forwarding Remote Access to Call Forwarding Call Forward Don't Answer Selective Call Forwarding Selective Call Acceptance Selective Call Rejection Anonymous Caller Rejection Priority Ringing/Call Waiting Speed Dialing Long Speed Dialing Short	\$2.00 Monthly
ValuPak@Work	Call Waiting Conference Calling Call Transfer Return Call (*69) Repeat Dial Distinctive Ringing Caller ID Name Caller ID Number Intercom Trunk Hunting Call Hold	Call Forwarding Remote Access to Call Forwarding Call Forward Don't Answer Selective Call Forwarding Selective Call Acceptance Selective Cal Rejection Music On Hold Speed Dialing Long Speed Dialing Short Call Pick Up	\$2.00 Monthly

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Section 4
4th Revised Sheet 24.2
Cancels 3rd Revised Sheet 24.2

4.14.2 RATES AND CHARGES (cont.)

- (5) Plain Talk Additional Line - Residential - these rates available for up to two (2) additional lines. There is a minimum service commitment of one year for Plain Talk Additional Lines. (C)

Plain Talk Additional Line - Business - these rates available for up to four (4) additional lines. There is a minimum service commitment of one year for Plain Talk Additional Lines. (T)

Residential	\$14.95 Monthly	(I)
Business	\$14.95 Monthly	

* 20 Hour Call Allowance (8000 Minutes for subscribers with both Plain Talk and DSL) applies to both initial and subsequent lines within an account. To receive an additional allowance on a subsequent line, that line must be subscribed to Plain Talk Service separately.

Vermont P.S.B. No. 1
Vermont Telephone Co., Inc.

Section 4
Fourth Revised Sheet 6

4. LOCAL EXCHANGE TELEPHONE SERVICE

4.8 Local Flat Rate Service Rates

4.8.1 Residential Flat Rate Service

4.8.1 Business Flat Rate Service

SCHEDULE A - RESIDENTIAL AND BUSINESS SERVICE

TELEPHONE RATE CLASSIFICATIONS

<u>Rate Group</u>	<u>Base Rate Area</u>	<u>Zone A</u>	<u>Zone B</u>	<u>Zone C</u>	
Residence	\$16.75	n/a	n/a	n/a	(I)
Business	\$26.50	\$26.50	\$28.05	\$30.80	

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Vermont Telephone Company

Section 4
Fourth Revised Sheet 14

4. LOCAL EXCHANGE TELEPHONE SERVICE

4.11 Lifeline Telephone Service / Vermont Universal Service Fund

2002 JAN -7 A 10:51

4.11.1 Lifeline Telephone Service

Lifeline Telephone Service consists of a waiver of the monthly "Federal Subscriber Line Charge." In addition, there is a reduction equal to the greater of \$7.00 or 50% per month in the local exchange rate, including zone charges. These credits are effective with bills rendered on, or after the effective date of this tariff. In no event shall the basic monthly exchange charge be reduced below zero. (C)

This service is restricted to residential subscribers. To qualify for lifeline service rates, a subscriber must be income-eligible and must apply through the Vermont Department of Prevention, Assistance, Transition and Health Access or the Department of Taxes. The subscriber's name must then be provided to the Telephone Company by the Vermont Department of Prevention, Assistance, Transition and Health Access on a list of eligible participants. The list will be updated monthly and reconciled quarterly. Seasonal customers are ineligible for lifeline service. (C)

Vermont Universal Service Fund

All residence and business customers are subject to a Vermont Universal Service Fund surcharge. The surcharge is applied as a percentage (set by Vermont Department of Public Service and approved by Vermont Public Service Board) on most services contained in this tariff. Those services not subject to the surcharge are noted throughout the tariff. (C)

4.11.2 Responsibility of the Subscriber

Proof of eligibility for the Lifeline rate is provided to the Company by the Vermont State Department of Prevention, Assistance, Transition and Health Access. All questions of eligibility should be directed to the State Department of Prevention, Assistance, Transition and Health Access. (C)

4.11.3 Responsibility of the Telephone Company

The Company will reconcile quarterly the list of eligible telephone numbers within each local exchange. If a subscriber is identified as being ineligible, Lifeline rate treatment will be discontinued. The Telephone Company will not be held liable for errors in the identification of eligible customers. Its liability will be limited to reasonable and prudent handling of the information provided by the Department of Prevention, Assistance, Transition and Health Access. (C)

Vermont P. S. B. No. 1
Vermont Telephone Company

Section 4
First Revised Sheet 14.1

4. LOCAL EXCHANGE TELEPHONE SERVICE (Cont'd)

4.11 Lifeline Telephone Service/Vermont Universal Service Fund (Cont'd) DEC 19 A 11:01

4.11.4 Compliance with FCC Universal Service Fund Order 97-157

The service of an eligible customer receiving the Lifeline credit may not be disconnected from local exchange service for non-payment of toll charges, unless a waiver is granted by the Public Service Board.

An eligible Lifeline customer who elects toll blocking shall not be required to provide a service deposit to initiate service.

A Lifeline service customer may voluntarily choose to block toll calls and access to Interexchange Carriers. Blocking is provided to a Lifeline customer at no charge.

Vermont Telephone Company, Inc. (SAC 147332)

Response to Line 3010 – Milestone Certification (47 CFR §54.313(f)(1)(i))

Vermont Telephone Company, Inc. hereby certifies that throughout 2017, it took reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas and that requests for such service are met within a reasonable amount of time. If a request for broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream is unreasonable, the Company offers broadband service at the highest available speed.

REDACTED – FOR PUBLIC INSPECTION

ATTACHMENT - LINE 3017

ATTACHMENT REDACTED IN ENTIRETY